

UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF NEW YORK

JACQUELINE CADDICK

2 EAST END Avenue #4A

NEW YORK CITY NY 10075

(In the space above enter the full name(s) of the plaintiff(s).)

-against-

PERSONNEL CO I LLC

767 5th Avenue 4th Floor

NYC 10153 Attn: LOREN MILLER

(In the space above enter the full name(s) of the defendant(s).
If you cannot fit the names of all of the defendants in the space
provided, please write "see attached" in the space above and
attach an additional sheet of paper with the full list of names.
Typically, the company or organization named in your charge
to the Equal Employment Opportunity Commission should be
named as a defendant. Addresses should not be included here.)

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S.D. OF N.Y.

COMPLAINT
FOR EMPLOYMENT
DISCRIMINATION

Jury Trial: ☒ Yes ☐ No
(check one)

16CV7326

This action is brought for discrimination in employment pursuant to: (check only those that apply)

X

Title VII of the Civil Rights Act of 1964, as codified, 42 U.S.C. §§ 2000e to 2000e-17 (race, color, gender, religion, national origin).

NOTE: In order to bring suit in federal district court under Title VII, you must first obtain a Notice of Right to Sue Letter from the Equal Employment Opportunity Commission.

Age Discrimination in Employment Act of 1967, as codified, 29 U.S.C. §§ 621 - 634.

NOTE: In order to bring suit in federal district court under the Age Discrimination in Employment Act, you must first file a charge with the Equal Employment Opportunity Commission.

Americans with Disabilities Act of 1990, as codified, 42 U.S.C. §§ 12112 - 12117.

NOTE: In order to bring suit in federal district court under the Americans with Disabilities Act, you must first obtain a Notice of Right to Sue Letter from the Equal Employment Opportunity Commission.

X

New York State Human Rights Law, N.Y. Exec. Law §§ 290 to 297 (age, race, creed, color, national origin, sexual orientation, military status, sex, disability, predisposing genetic characteristics, marital status).

New York City Human Rights Law, N.Y. City Admin. Code §§ 8-101 to 131 (actual or perceived age, race, creed, color, national origin, gender, disability, marital status, partnership status, sexual orientation, alienage, citizenship status).

I. Parties in this complaint:

- A. List your name, address and telephone number. Do the same for any additional plaintiffs named. Attach additional sheets of paper as necessary.

Plaintiff Name JACQUELINE CADDICK
 Street Address 2 EAST END AVENUE #4A
 County, City NEW YORK CITY
 State & Zip Code NY 10075
 Telephone Number 917 755 5410

- B. List all defendants' names and the address where each defendant may be served. Make sure that the defendant(s) listed below are identical to those contained in the above caption. Attach additional sheets of paper as necessary.

Defendant Name Personnel Co I LLC Attn Loren Miller
 Street Address 767 5th Avenue 47th Floor
 County, City NEW YORK CITY
 State & Zip Code NY 10153
 Telephone Number 212 702 4358

- C. The address at which I sought employment or was employed by the defendant(s) is:

Employer Carl & Gail Icahn
 Street Address 15 West 53rd Street # 51B
 County, City NEW YORK CITY
 State & Zip Code NY 10019
 Telephone Number 212 265 8650

II. Statement of Claim:

State as briefly as possible the facts of your case, including relevant dates and events. Describe how you were discriminated against. If you are pursuing claims under other federal or state statutes, you should include facts to support those claims. You may wish to include further details such as the names of other persons involved in the events giving rise to your claims. Do not cite any cases. If you intend to allege a number of related claims, number and set forth each claim in a separate paragraph. Attach additional sheets of paper as necessary.

- A. The discriminatory conduct of which I complain in this action includes: (check only those that apply)

☐ Failure to hire me.
☒ Termination of my employment.
☐ Failure to promote me.
☐ Failure to accommodate my disability.
☒ Unequal terms and conditions of my employment.

X Retaliation.

Other acts (specify): Sever Pervasive hostile work environment.

Note: Only those grounds raised in the charge filed with the Equal Employment Opportunity Commission can be considered by the federal district court under the federal employment discrimination statutes.

B. It is my best recollection that the alleged discriminatory acts occurred on: Jan 2015-Sep 2015
Date(s)

C. I believe that defendant(s) (check one):

X is still committing these acts against me.

_____ is not still committing these acts against me.

D. Defendant(s) discriminated against me based on my (check only those that apply and explain):

☐ race _____ ☐ color _____

☒ gender/sex _____ ☐ religion _____

☒ national origin _____

☐ age. My date of birth is _____ (Give your date of birth only if you are asserting a claim of age discrimination.)

☐ disability or perceived disability, _____ (specify)

E. The facts of my case are as follow (attach additional sheets as necessary):

SEE Attached FACTS Sheets 9 pages.

Note: As additional support for the facts of your claim, you may attach to this complaint a copy of your charge filed with the Equal Employment Opportunity Commission, the New York State Division of Human Rights or the New York City Commission on Human Rights.

III. Exhaustion of Federal Administrative Remedies:

A. It is my best recollection that I filed a charge with the Equal Employment Opportunity Commission or my Equal Employment Opportunity counselor regarding defendant's alleged discriminatory conduct on: JUNE 2015 (Date).

B. The Equal Employment Opportunity Commission (check one):

_____ has not issued a Notice of Right to Sue letter.
X issued a Notice of Right to Sue letter, which I received on June 25th 16 (Date).

Note: Attach a copy of the Notice of Right to Sue letter from the Equal Employment Opportunity Commission to this complaint.

C. Only litigants alleging age discrimination must answer this Question.

Since filing my charge of age discrimination with the Equal Employment Opportunity Commission regarding defendant's alleged discriminatory conduct (check one):

YES 60 days or more have elapsed.
 _____ less than 60 days have elapsed.

IV. Relief:

WHEREFORE, plaintiff prays that the Court grant such relief as may be appropriate, including injunctive orders, damages, and costs, as follows:

I would like for the Court to determine as I am
not a lawyer.
 (Describe relief sought, including amount of damages, if any, and the basis for such relief.)

I declare under penalty of perjury that the foregoing is true and correct.

Signed this 20 day of September, 2016

Signature of Plaintiff

Address

Telephone Number

Fax Number (if you have one)

Jm Laddick.
2 EAST End Avenue #4A
NEW YORK CITY
NY 10075
917 755 5410
NONE

FACTS

In January 2015 I was employed in Brooklyn as a part-time house manager I had worked at this job for two and half years. I was placed with my employer through an employment agency called Pavillion. The agent that represented me is Rosalie Aguilar who was a former employer of Carl and Gail Icahn. She had told me that she had work for the Icahn's for a little over 3 years after leaving there employment had taken the position at the agency. In the December of 2014 I had called Rosalie and told her that I was looking for a part time personal assistant position because my job in Brooklyn was only 3 days a week. Around January 10th 2015 she told me that she wanted to send me for a position with her former employers as House manager, (I am attaching a copy of the application form I filled in.) My first interview was at their home I was to meet her around 3.30pm Mrs Icahn never arrived. The next day Rosalie called me and told me she wanted to meet me at her office, I went there at 6.30pm. During the interview Mrs Icahn told me "you're the lucky one he likes English people." I asked if Mr Icahn was in the building and would I be able to meet him. She called to his office and took me to meet him. Mr Icahn asked me where I was from and we spoke a little about the job, and he asked me some questions about myself. After a few minutes he said "I like you, you have got good answers" Then Mrs Icahn and I left his office. When we got to the elevator she said to me, "Don't think you have got the job just because he likes you, I will be making the decision not him". I told her I don't presume anything you must have lots of people wanting this job because of who he is." The next day Jennifer the current house manager called me and asked me if I could do a couple of trial days so I did for the next 2 weeks. I officially started February 1st 2015.

The first 3 weeks I had to learn a lot of things and Jennifer was teaching me everything. She had handed in her notice and was to leave on 6th Feb. Another girl Angela Lo was also hired as Mr Icahn's personal assistant. She started a couple of days after me, She quit after 2 weeks She had been upstairs talking to Mrs Icahn when she came down she said. "He is ok but she is an evil bitch". She quit 2 days later. It was a couple of days after Angela had left I was in the kitchen and Mr Icahn was calling me to come into his office, He was calling me Jennifer, Julie, then I realized he was calling me so I went into the office. I said " Mr Icahn My name is Jackie I did not realize you wanted me". He said " I am sick to death of this, this house is like a revolving door and the people in my office have worked for me for more than 32 years." It was some time in the middle of March when Mrs Icahn started to change her attitude towards me. One day she came into the kitchen and said "you come with me your going to drive me today". She told me to go through Central park as we were driving in the park she said "why are you driving so Fucking slow I am in a hurry." There was a car in front of me, I asked her how to get out at 72nd Street and she said "Read the Fucking Signs, and make that light". I started to drive the car faster to make the light and she said " your going to fast." When I turned onto Madison avenue she was shouting at me to cut other cars off and don't let other people in, and to tail gate one

car so that I could make the light. I was so nervous. I asked her what is tailgating. She said "you better learn how to drive this car properly." When I dropped her off I was shaking. I picked up Mr Icahn after I had dropped her and he said to me "Jackie get yourself out in this car so you can get used to it". I asked Mrs Icahn if I could come on Saturday morning at 8am and take the car out for a while as it was my day off and she said. "No you fucking can not it's my car". I said Mr Icahn told me to take it out and she said "I don't care."

Another time when Mrs Icahn made comments about my accent was sometime in March the Chef was on his day off and Mrs Icahn asked me to check if he had made soup for the dinner. I went to check when I came back I said "yes there is a pan of vegetable soup in the fridge." She said to me "speak properly I cannot understand that stupid accent, It's a pot not a pan." I said "give me a break in England the pot is where you teach the children to go to the bathroom, so we call it a pan."

Another time Mrs Icahn singled me out was when Mr Icahns complained that his bed was not made properly. This was Leslie's job as she was Mr Icahn new PA. Mrs came into the Kitchen Leslie, Eliane and myself were all there. She started screaming about all of the things that were not being done, but she was directing everything at me. After that group meeting I had a meeting with Mrs Icahn I asked her how come I was the one being singled out when that was not my job. She said "You need to pay your rent so suck it up". She made the work environment a sever pervasive and hostile place to be in everyday. After my shift finished at 6pm I went to Pavillion agency and asked to speak to Rosalie. I told her I wanted her to find me a new job she said "No stay, it will get better she must be a bit stressed, and you said you like Mr Icahn because he is funny." I told Rosalie "Yes Mr Icahn is ok but to work for him you have to be around her no way get me out". In three weeks Rosalie would get her commission for placing me with the Icahns.

When Mr Icahn had complained about the things that were not getting done properly by Leslie most of her duties were given to me as well as my own duties. One week I was upstairs and Mr Icahn came up and saw me the same thing happened the next day and he said Why are you always up here. I said "yes its always me you see doing the work there are supposed to be 3 of use working in this house but you always see me." He said "I am watching you and I know you work Hard."

Leslie Mr Icahns PA quit and Mrs Icahn Hired Karen Bush as the House manager (which was also the title of the job I had originally applied for) Karen was a trained nurse and was to work for Mr Icahn. Karen started in April. The first time Karen drove Mrs Icahn she came back to the apartment and said to me do you know what she just said, she was on the phone talking to her friend and and her friend must have asked her what are you doing she said. "I AM IN THE CAR WITH THE NEXT VICTIM."

It was around June 8th I was told by Karen Bush that I had to sleep over with Mr Icahn at his home because Mr Icahn was going to Switzerland for the day on the 10th. I told Karen that It was not part of my job as I am not a trained nurse and that, that was her responsibility as she was hired because she is a trained nurse. She spoke with Mrs Icahn and Mrs Icahn told her to tell me. "your going to do it like everyone else because you need to pay your rent". I asked Karen was I going to be paid overtime and she spoke with Mrs Icahn and I was told by Karen nobody else gets it so your not. I worked on the 10th June from 2pm-12pm Mr Icahn had a dinner guest. I went up around 12.30am and Mr Icahns was still working in his office. The next day I was on the early shift 9am – 5pm

Mrs Icahn returned from Switzerland on the 11th of June 2015. That evening she left for East Hampton and did not return to the city until September 8th at 11.30pm.

The start of summer construction I think was July 21st 2015. I was on the schedule to start at 10am – 6pm Mrs Icahn and Karen do the scheduel

When I arrived at the house The workmen were already there and had move furniture, ornaments, and art work. They had been given a key to get in to the apt and the security code. There was about 30 men and they worked for one week and we were all informed that Mr Icahn was coming back Into the city, I think it was July 27th that Monday, He would be alone he had meetings at his home for a couple of days. He would spend Tuesday Wednesday and Thursday and then return to East Hampton on Thursday evening. The work was stopped and I cleaned the house and prepared everything for Mr Icahn to return. He came with by boss Karen Bush and Eliane Silva. Karen told me that I would have to sleep over again to look after Mr Icahn. I told her No again I said I was not medically train and did not want to be held liable if anything happened to him and I never got paid last time so no. Karen said she was going to complain to Loren Miller in the Icahn Human Resources. I told her to go ahead. When Karen called Loren and told her the situation Loren said I was not to sleep over because it was not part of my job description. Karen called Mrs Icahn and told her and Mrs Icahn was furious. She told Karen "Who the F- -K told you to go over my head and talk to HR. I am in charge of the house." Karen complained to me that I get her into trouble. I did not work the sleep over the second time.

From that time on Mrs Icahn got even nastier with me on the telephone. Not using my name and calling me you.

When I started the job I was told the only vacation you can have is in August. So in May I requested 2 weeks from 7th until the 24th August. Mrs Icahn approved my vacation. I had been working for them from the end of January and had not had a single day off. 2 weeks before my vacation Karen reminded Mrs Icahn. Karen called me and said. She has it in for you she said "How the F- -K did she get vacation and Karen said you approved it in May". She told me that Mrs Icahn said "If I had my way she would not get any time off,"

Before my vacation I was told I had to go to the Hamptons to work the weekend July 31 2015 I was told to book an 8 am jitney. That weekend one of the seasonal workers needed time off and Eliane wanted time off for her birthday. Karen told me Mrs Icahn was planning a dinner party and that I would work the party, I had never worked a large formal dinner party before so I set the table and Claudia showed me what to do. When Karen told me to book my ticket to the Hamptons she said Mrs. Icahn told her to tell me I was to book and 11pm return on the Sunday evening. I was in the Kitchen with Karen and Mrs. Icahn came in around 3.40pm and said "what are you still doing here." Karen looked at me after she left the room Karen said go figure CADDICK". I asked John the house manager to take me to the train station so he did..

When I arrived to the apartment on 3rd August the work men were already there and they had again moved all of the furniture and the art work and ornaments. I called Karen and asked her who was going to be in the city to supervise the workmen there were about 24 of them, while I was on vacation. Karen told me she had asked Mrs Icahn and was never given an answer nobody was with them during my vacation time. I worked that week and on Friday left for a 2 week vacation.

When I returned to work on Monday 24^h August Karen called and said she had been in the apt. and it was like a construction site so she was going to have Eliane come on the 26th Aug to help me. When Eliane came she told me you take care off all of Mr Icahns things and I will take care of everything for Mrs. There was a different Forman Tom was on another job, The new guy was Glen who informed me that he was freelance, He had also been given the key and security codes. Karen called me that morning to welcome me back and she informed me that it was going to be the last week that the work men were in the apartment and she had given me the weekend off but Mrs Ichan had gone crazy saying she always get the weekend of so Karen was told to give me Thursday and Friday off. Mrs. Icahn said that I was not going to have another weekend off so the last 2 days the work men were going to be in the apartment .I was on my days off. When I spoke to Karen she said "go figure CADDICK there are millions of dollars in art sculptures & glass in the apartment and she said you cannot have the weekend off even though it's the last 2 days the work men are there." I told Karen "that's fine but I am not responsible for anything lost stolen or damaged if I am not here"

On the Saturday 29th when I returned I notice things that were broken and missing so I told Karen as she was my boss. I told her to inform Mrs. Icahn about the damages. She said she had told her and had no reply. I called the architect and told him about the damaged and missing thing and he said that it had nothing to do with them.

That week the workmen were supposed to have gone but they had damaged a pipe in the staff office and had to take down the ceiling and bring in other professionals to fix the problem. That was the week I was supposed to clean the apt. Guido the architect came Monday 31 Aug to check the work and complained. He had 10 workmen come back to fix everything he was not happy with. During this time I called Karen to ask her when we can have the cleaning ladies come back Mrs. Icahn said that I was Lazy and that I had to clean the whole apt. which is almost 2 whole floors of the building and regularly we have 2 cleaning ladies each week and we all have to clean each day. When I took the job Jennifer who was the house manager informed me that during the summer I would be staying in the apt. and that after the work is done a team of 6 people come for 3 days and clean everything in the apt. They take dishes out of cupboards and clean all of the ornaments and artwork. They are hired by Guido the architect. Ms Icahn said I was to do everything by myself because I had nothing to do. On a regular week there are 3 of us cleaning daily and the cleaning ladies come and that is when there is no construction.

They arrive back on the 8th Sep 2015 around 11.30pm. I had cleaned as much as I could and prepared the food and put everything back the way it should be. I saw Mrs. Icahn on the Wednesday morning. Mrs. Icahn told me that her Jewelry tray was dirty and that I had to take out all the jewelry and clean it. On Thursday I was to serve a dinner party for 7 people. I did and the next day Mrs. Icahn complained my service was bad and that the table setting was terrible. She complained that her bathroom was not cleaned properly and when I explained I did not clean it Eliane had she said "you are always trying to accuse other people" I said I am not you asked me a question and I am telling you I did not do the work. She told me the silver was not polish and that she was going to make me polish every piece of silver in the house. I told her do you want me to start now it was Friday at 3.30 I had to leave early because I had 3 hours overtime and my hours were 10am-6pm she said you're going to do it next week.

THE WEEK STARTING 14th SEPTEMBER MRS ICAHN GAVE ELIANE OFF SO SHE COULD TAKE A CLASS.

On Monday the 14th I arrive and there was a note from Karen telling me Mrs. needed the car early on Tuesday morning and that I was to get it cleaned and fill it with gas. Mrs. Had already left the house. When Mr. Icahn came down he asked me to hurry with his breakfast because he had a lot of things to get done. Karen arrived at 12noon and asked if I had seen the note. At 2pm Sue Zippo Mrs. Icahn's assistant called me and told me to get the car and come over to kick up Mrs. Icahn. When she got in the car she had a shopping bag that I had picked up shoe in

the week before. I asked her did the shoes fit and she said no she had returned them for some other things. She said "was Carl in a good mood today and I said he was a little nervous about going on TV. She said "Did he shout at you." and I said no he was telling me to hurry. And she replied "No because you're his favorite he never shouts at you." I said he does when I get things wrong that's why I don't get his stuff wrong. When I dropped her at her daughters apt. on 71st she said to me as she was getting out of the car, get the car gassed and put this bag in my room when you get back. I did not look inside the bag I said ok. I called Karen and asked if Mr. Icahn needed the car she said no. I told her Mrs. has just told me to gas the car and Karen said "Get it washed as well I don't want to hear it from her." So I did and I left the bag in the car when it went through the car wash. When I got back I took the bag to her room and left it there it was about 5.30pm. Karen told me "CADDICK just finish the things down stairs I will take everything up and do the turn down, because if you do overtime I am going to hear it from her so I folded some laundry and left it on the counter and went home. The chef was on his day off so Eliane came after her class to prepare the dinner for the Icahns.

The next morning Tuesday I started at 9.30 so I was there at 9.15 am when I went into the kitchen Mrs. was already down. She said what the F - K are you doing here so early and I said I have to let the gardening girls in. She went upstairs. She came down again around 2pm Mr. Icahn was working on the terrace. Karen was in the kitchen with me. She came into the kitchen and said did you let that bag out of your sight and I said yes I left it in the car when I washed it. She said my 22K diamond engagement ring is missing from the bag she had a small cream pouch in her hand. I said "you gave me a bag with jewelry in it and never told me. She said I never told you to wash the car. I said no you didn't but I called Karen and she told me to get it washed and she is the boss so I did as I was told. She said you're an idiot. All of my jewelry was in the bag. I asked her how much is the ring worth and she said \$250,000.00 I said are you sure it was in the bag do you want me to go upstairs with you and check the safe. She said didn't I just say I took it out of the safe deposit. She then said I am going to call the police commissioners office. She left around 2.30pm to walk the 7 blocks to the office. When she left I said to Karen she is lying a 22k diamond ring costs about 3-4 million. Karen said she did seem a little to calm about it. Around 4.30 pm the phone rang Karen answered it was sue Zippo. Karen said CADDICK what are you going to do. I took the phone. Sue asked me can you remember were you washed the car. I said I have a receipt with the address and telephone number. She said why did you leave the bag in the car I told her I do not look through her stuff she never told me it was full of jewelry. Sue said I am calling the commissioner's office. I said you have to do your job. I finished my shift at 6.30pm and went home. I was very upset and was wondering when the police were going to call. Nobody ever called. I went to bed at 10pm because I was on the early the next day.

I woke up late and rushed out of my apt. I never checked my phone. When I got to the Icahn's it was 8.50am the cleaning lady was waiting for me in the hall way. When I walked into the kitchen Mrs. Icahn was there she said what the fuck you are doing here so early again. I said the cleaning ladies are behind me I have to let them in. She left the room. And went upstairs. I asked Barbara who has worked in their home for 25 years. Can you check if there are other things broken or missing because the architect won't take responsibility for the damaged thing? Mrs. Icahn came down dressed she was by the front door she started screaming at me I was a F—king Idiot and useless and she doesn't know why she even bothers to employ me she should just get rid of me because I don't do anything. She started blaming me for the missing items and damaged items. "I said you told me I am just a housekeeper and I have no power so I told my boss Karen and if she doesn't do her job is that my fault to". She said your F—king useless and walked out and slammed the door. I was so upset I started crying. Barbara came over and told me don't let her get to you. I went into the kitchen and called Karen I asked her not to be late because I was alone and Mr. Icahn might come down soon. She came at 10am when she came in she said "CADDICK did you see it I said see what she said the email last night at 11.30pm I said no I haven't had a chance she jumped on me when I came in and then she had another go at me before she left. Karen said you were right she has the ring. I looked at the email it said (woops everyone sorry to make you all nervous but the ring had fallen out of the pouch and was stuck between the shelves in the safe.) I said to Karen have you seen the size of a 22k diamond there is no way it can get stuck between shelves and you not see it. I know this because I worked in fashion and had to borrow a 10K diamond from Fred Leighton on Madison ave for a shoot. And they asked me to take a 2 and half million insurance for the ring I was borrowing.

On Thursday she had left before I arrived at the apartment. I walked Mr Icahn to his office so I could check his suit was clean and deliver his mail to his assistant Susan Gordon. On the way walking Mr. Icahn said to me Jackie you know I like you, you work hard and I like that about you.

On Friday the 18th I arrived at 9.40am the doorman told me there had been a mix up with the dry cleaners so I went to the delivery room on 7th floor. I had missed the guy so I went up to 51 to called the dry cleaner and was on the phone for 10 mins. When I put the phone down Mrs Icahn walked in she started screaming at me that I was late she had come down at 9 am and that I was not here. I said I don't do the schedule you do with Karen my hours for the past 8 month have been Friday 10am-6pm it has not changed and now its 9.55 am so I am not late. She said well you need to get a move on I am going to the gym. I changed my clothes quickly and started to set the table it was around 10.20 am and I heard Mr Icahn coming down. When he came in the room he said Jackie why are you not ready I said Mr Icahn you are down 1 hour and 40 mins early I only started at 10am. He said ok hurry up I forgot something upstairs I am going

to get it. When he went into the hall I heard Mrs. Icahn's voice saying she wasn't ready and Mr. Icahn said yes but we are very early and she's getting it done. She walked out and slammed the door. I gave Mr. Icahn his breakfast and went upstairs to change the sheets on the bed. Karen had arrived so I asked her to call me when Mrs. came back because she was having a go at me again today. Karen never called me I heard Mrs. Icahn's voice she was in the kitchen laughing with Karen when I walked in she walked out and went to sit down. I prepared her breakfast and took Mr Icahn's dishes away and cleaning the kitchen and Mr. I Cahn called me. He said Jackie you didn't set the terrace I said I have been very busy because your early I will do it now and he said ok. Karen was having a coffee in the Kitchen. Mrs Icahn got up and went upstairs. She rang down to the kitchen for Karen to go up. When Karen came down she said CADDICK get yourself another job and get the hell out she hates you. I went over to the other side of the apartment to clean the dining table. As I was coming back I saw Mr. Icahn going upstairs. Karen came out of the kitchen and gave a strange look. As I walked into the kitchen Mrs Icahn had a piece of paper in her hand she said I need to talk to you. I said yes we went into the living room. She said that she had discussed it with Mr Icahn and that I was over qualified for the job and that they would have to let me go. I said yes I am over qualified by thank you for the opportunity. She then said "You so talented that you can run a house all by yourself. And I hope you don't think this is presumptuous of me but I have called the agency and told them to get you a manager's job so you will be working again soon." I said that was very kind of you. She handed me the paper work and said you need to sign this and you will get a severance package and I will give you a great reference. I went into the kitchen change and gave her the key credit cards and receipts and left at 11.45am.

When I got outside I called Rosalie at Pavillion and asked her what Mrs Icahn had said and she said she had not spoken to her I called her a liar and said she just told me that she spoke to you. She then change her answer to she left me a message. I said I will be in your office in 10 minutes I want to hear the message. Rosalie was waiting by the door for me with her wallet she said I am going to take you to lunch. After lunch I said I am coming back to the office I want to hear the message conveniently it had been erased while we were at lunch by a colleague. Rosalie would not return my calls or I was told she was off or on holiday or in a meeting.

I began to check the Pavillion job listings every week and make a list of the jobs that Rosalie could have sent me for. When I asked her why I was not being sent to these jobs she told me. "There not enough money for you Mr Icahn put you in a league of your own just hang in there something will come up". I told her " I need a job. I don't care about what league you think I am in. in the last week of March 2016 Rosalie called me and said "Guess who I was talking to today about you. Gail Icahn, I asked her if she was ever going to give you a reference so that you can get a job and she said. (" IF ANYONE WANTS A REFERENCE FOR HER YOU CAN GIVE

THEM MY DIRECT NUMBER AND I WILL GIVE HER A REFFERENCE") I said to Rosalie I don't want a reference from her and if you give her number to anyone we are going to have a problem.

At this point I had filed a complaint with the division of Human rights and had made a complaint with the New York State Department of Labor.

I

Sep 23rd
2015

Part time Personal Assistant
ID. PAV9228PH.

Oct 22.
2015. Personal Assistant
ID PAV80941W.

OCT 23. Part time Personal Assistant.
ID PAV2199TG.

OCT 27th. Cook, Other Personal Assistant
ID PAV9348HR.

OCT 28th. Executive Housekeeper Housemanager.
ID PAR9357RA.

NOV 6th Housemanager Personal Assistant.
ID PAV9385JG.

NOV 23rd Part time Personal Assistant.
ID PAV5995RA.

NOV 30th. Personal Assistant.
ID. PAV9443SG.

DEC 7. Personal Assistant.
ID PAV94631W

5hrs week
expansion of hours.

Jan 4.
2016. Personal Assistant. OUT of metro Area.
ID. PAV9534IW.

Jan 7 Personal Assistant.
ID PAV9559NO.

FEB 4 Personal Assistant.
ID. PAV9021CG.

FEB 19 Personal Assistant.
ID. PAV9674JNG.

FEB 22. Part time Personal Assistant.
20 hrs week.
ID. PAV8913RA.

Wendy Fleishman Interview April 3rd
APR 3. April 6th 2016 Interviewed with
Kathy Prounis.

ID. PAV9719JNG.

FEB 25th. Personal Assistant.
ID. PAV9401IW

Personnel Co I and its affiliated companies (the "Company"), is an equal opportunity employer and complies with all federal, state and local laws that prohibit discrimination in employment because of race, color, creed, national origin, ancestry, religion, age, gender, sexual orientation, marital or veteran status, disability or any other basis prohibited by applicable law.

Position desired: Manager/Housekeeper

JACQUELINE M CADDICK
First name Middle Initial Last Name

Do you now, or have you ever used or been known by another name? Yes ___ No X.

If yes, list alias(es) used and dates _____

2 East End Avenue #4A NYC NY 10075
Street address/P.O.Box City County State Zip

917 755 5410 Caddickjackie@yahoo.co.uk
Primary Telephone Number Primary E-mail Address

Are you a relative of any Icahn employee? Yes ___ No X. If yes, provide name, relationship, and location of employee _____

WORK HISTORY

☐ Check this box if you do not have prior work experience.

Have you previously applied, interviewed with, or been employed by the Company? Yes ___ No X. If yes, provide date of application/interview/employment: _____

Note: Please account for your entire employment history (most recent first including periods of self-employment. Attach additional pages, if necessary).

1. Douglas Jaffe 197 Baltic Street Brooklyn NY
Name of Employer Address

Housekeeper Douglas Jaffe 646 775 2765
Position TOTAL Salary 51K Supervisor's name, title and telephone number

Base Salary 43K health insurance \$18000 I make no Contribution
Compensation (Base salary/Bonus/Long-Term Incentive Compensation). Show date of last increase/grant for current compensation and two prior iterations.

> Describe work performed and scope of responsibilities: Cleaning of home. Laundry
Cooking, Groceries Shopping, Supervise Contractors Personal Shopping

From (Month/Year): 6/18/12 To (Month/Year): Present

> Reason for leaving: Need a full time position

2. Lita Lepie

EEOC Form 161 (11/09)

U.S. EQUAL EMPLOYMENT OPPORTUNITY COMMISSION

DISMISSAL AND NOTICE OF RIGHTS

To: **Jacqueline Caddick**
2 East End Ave Apt 4A
New York, NY 10075

From: **New York District Office**
33 Whitehall Street
5th Floor
New York, NY 10004



On behalf of person(s) aggrieved whose identity is
CONFIDENTIAL (29 CFR §1601.7(a))

EEOC Charge No.

EEOC Representative

Telephone No.

16G-2016-00250

Holly M. Woodyard,
State & Local Program Manager

(212) 336-3643

THE EEOC IS CLOSING ITS FILE ON THIS CHARGE FOR THE FOLLOWING REASON:



The facts alleged in the charge fail to state a claim under any of the statutes enforced by the EEOC.



Your allegations did not involve a disability as defined by the Americans With Disabilities Act.



The Respondent employs less than the required number of employees or is not otherwise covered by the statutes.



Your charge was not timely filed with EEOC; in other words, you waited too long after the date(s) of the alleged discrimination to file your charge



The EEOC issues the following determination: Based upon its investigation, the EEOC is unable to conclude that the information obtained establishes violations of the statutes. This does not certify that the respondent is in compliance with the statutes. No finding is made as to any other issues that might be construed as having been raised by this charge.



The EEOC has adopted the findings of the state or local fair employment practices agency that investigated this charge.



Other (briefly state)

- NOTICE OF SUIT RIGHTS -

(See the additional information attached to this form.)

Title VII, the Americans with Disabilities Act, the Genetic Information Nondiscrimination Act, or the Age Discrimination in Employment Act: This will be the only notice of dismissal and of your right to sue that we will send you. You may file a lawsuit against the respondent(s) under federal law based on this charge in federal or state court. Your lawsuit **must be filed WITHIN 90 DAYS of your receipt of this notice**; or your right to sue based on this charge will be lost. (The time limit for filing suit based on a claim under state law may be different.)

Equal Pay Act (EPA): EPA suits must be filed in federal or state court within 2 years (3 years for willful violations) of the alleged EPA underpayment. This means that **backpay due for any violations that occurred more than 2 years (3 years) before you file suit may not be collectible.**

On behalf of the Commission



Kevin J. Berry,
District Director

JUN 23 2016

(Date Mailed)

Enclosures(s)

cc:

Attn: Loren Miller, H.R./Payroll Mgr.
PERSONNEL CO I LLC
767 5th Avenue, 47th Floor
New York, NY 10153

Steven D. Hurd, Esq.
Proskauer Rose, LLP
Eleven Times Square
New York, NY 10036-8299